

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE:

BRYANT D. CLARK  
xxx-xx-6323  
219 Palomino Lane  
Celina, TX 75009

DEBTOR

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CASE NO.13-40305  
CHAPTER 13

OBJECTION TO ALLOWANCE OF CLAIM #7  
FILED BY BANK OF AMERICA

**NO HEARING WILL BE CONDUCTED ON THIS OBJECTION UNLESS AN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN RESPONSE IS FILES AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR RESPONSE MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

BRYANT D. CLARK, the above named Debtor, objects to the allowance of the claim #7 by BANK OF AMERICA, filed herein in the amount of \$248,990.15, upon the following grounds:

1. This is a Chapter 13 case filed 2/4/2013.
2. On or about March 27, 2013, BANK OF AMERICA filed Proof of Claim arrearages for \$17,229.47, alleging a security interest as described in the Proof of Claim.
3. Debtor disputes this arrearage claim. Debtor alleges that the arrears to this creditor is only of \$12,636.00 at 0% interest.

WHEREFORE, BRYANT D. CLARK, Debtor, prays that said claim #7 of BANK OF AMERICA in the arrears amount of \$17,229.47, be allowed as a secured arrearage claim in the amount of \$12,636.00 at 0% interest, and that they have such other and further relief as is just.

DATE: April 16, 2014

Respectfully submitted,

BARRON & BARRON, L.L.P.  
P. O. Box 1347  
NEDERLAND, TEXAS 77627  
(409) 727-0073

BY: /s/ Robert E. Barron  
ROBERT E. BARRON  
TBA NO. 01820800

ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2014, a true and correct copy of the above and foregoing document shall be served via electronic means, if available, otherwise by regular, first class mail, to the following:

**Bank of America**

400 Countrywide Way  
Mail Stop SV- 46  
Simi Valley, CA 90365

**Bank of America, N.A.**

c/o BDFTE, LLP  
15000 Surveyor Blvd Suite 100  
Addison, TX 75001

**Janna L. Countryman**

P.O. Box 941166  
Plano, TX 75094-1166

**Mr. and Mrs. Bryant D. Clark**

219 Palomino Lane  
Celina, TX 75009

**Steve Turner**

Barrett Daffin Frappier Turner & Engel  
610 West 5th Street, Suite 602  
Austin, TX 78701

**Capital One, N.A.**

Bass & Associates, P.C.  
3936 E. Ft. Lowell Road, Suite #200  
Tucson, AZ 85712

**Green Tree Servicing LLC.**

Po Box 6154  
Rapid City, SD 57709-6154

**Vendvision, Co-Debtor**

2695 Villa Ci Circle  
Dallas, TX 75244

**JPMorgan Chase Bank, N. A.**

c/o BDFTE, LLP  
15000 Surveyor Blvd Suite 100  
Addison, TX 75001

**Nissan Motor Acceptance**

c/o Charles E. Lauffer, Jr.  
821 ESE Loop 323, Suite 530  
Tyler, TX 75701

**US Trustee**

Office of the U.S. Trustee  
110 N. College Ave., Suite 300  
Tyler, TX 75702

**Alane A. Becket**

Becket & Lee LLP  
PO Box 3001  
Malvern, PA 19355

**eCAST Settlement Corporation**

POB 29262  
New York, NY 10087-9262

/s/ Robert E. Barron  
ROBERT E. BARRON